

EXHIBIT B

From: Nathan Chapman
Sent: Friday, March 3, 2023 7:07 PM
To: Levi McCathern
Cc: khayden@cozen.com; C. Celeste Creswell; Jesse Cromwell; Jim Sherry; Noah McCathern; Elizabeth Criswell
Subject: RE: [External] Michael Irvin

Levi,

What exactly are you claiming is non-compliant? The production we are making fully complies with Rule 34 and the court's order. If you are going to accuse us of flouting a court order, you need to identify what you believe is deficient.

Regards,

Nathan D. Chapman
KABAT CHAPMAN & OZMER LLP
Direct: (404) 400-7303
Email: nchapman@kcozlaw.com

From: Levi McCathern <lmccathern@mccathernlaw.com>
Sent: Friday, March 3, 2023 5:09 PM
To: Nathan Chapman <nchapman@kcozlaw.com>
Cc: khayden@cozen.com; C. Celeste Creswell <ccreswell@kcozlaw.com>; Jesse Cromwell <jcromwell@mccathernlaw.com>; Jim Sherry <jsherry@mccathernlaw.com>; Noah McCathern <nmcathern@mccathernlaw.com>; Elizabeth Criswell <ecriswell@mccathernlaw.com>
Subject: RE: [External] Michael Irvin

Nate,

For Certificate of Conference purposes, can you explain why you feel it is unnecessary to fully comply with the Court's order?

"It is further ORDERED that Defendant produce the items and documents sought in Plaintiff's Request for Production 1 (Dkt. #5 at p. 8) no later than March 7, 2023 at 5:00 pm"

Levi G. McCathern, II

Partner

Board Certified Civil Trial Law and

Labor & Employment Law

3710 Rawlins Street, Suite 1600

Dallas, Texas 75219

p: 214.741.2662 | **f:** 214.741.4717

lmccathern@mccathernlaw.com

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From: Nathan Chapman <nchapman@kcozlaw.com>
Sent: Friday, March 3, 2023 3:01 PM
To: Levi McCathern <lmccathern@mccathernlaw.com>
Cc: khayden@cozen.com; C. Celeste Creswell <ccreswell@kcozlaw.com>
Subject: RE: [External] Michael Irvin

EXTERNAL EMAIL CAUTION!
This email originated from outside of the organization.

Mr. McCathern,

Please see my attached correspondence.

Regards,

Nathan D. Chapman
KABAT CHAPMAN & OZMER LLP
Direct: (404) 400-7303
Email: nchapman@kcozlaw.com

From: Levi McCathern <lmccathern@mccathernlaw.com>
Sent: Wednesday, March 1, 2023 4:01 PM
To: Nathan Chapman <nchapman@kcozlaw.com>
Cc: khayden@cozen.com; C. Celeste Creswell <ccreswell@kcozlaw.com>; Jesse Cromwell <jcromwell@mccathernlaw.com>; Noah McCathern <nmccathern@mccathernlaw.com>; Jim Sherry <jsherry@mccathernlaw.com>
Subject: RE: [External] Michael Irvin

Y'all going to give us the stuff this time or do we need to wait for another meaningless appeal?

Levi G. McCathern, II

Partner

Board Certified Civil Trial Law and

Labor & Employment Law

3710 Rawlins Street, Suite 1600

Dallas, Texas 75219

p: 214.741.2662 | **f:** 214.741.4717

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From: Nathan Chapman <nchapman@kcozlaw.com>
Sent: Friday, February 24, 2023 11:50 AM